



Law Offices of

*Reverend Rickey Nelson Jones, Esq.*



## MEMO ENDORSED

6 July 2007

The Honorable Judge Denny Chin  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

USDC SDNY  
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DOC #: \_\_\_\_\_  
DATE FILED: \_\_\_\_\_

Bear Judge Chin: 7/9/07

RE: \*Genesis Office Systems, Inc. v. Gestetner/Savin  
Corporation, et al., Case #: 07 CV 3682

\*Need For Postponement Of Pre-Motion Conference

should

advisit

in advance.

A week ago, opposing counsel sent me a fax indicating a pre-motion conference was scheduled for July 9, 2007. I immediately tried to send him a response fax indicating I had not heard from the Judge, which is a commonplace practice in Federal Court in Maryland (usually written notice). Due to some kind of system failure at opposing counsel's office on June 29, 2007, I sent him an e-mail on Monday, July 2, 2007. He responded by telling me his notice to me was normal in New York and I could call your clerk, a Mr. David Tan. I called him immediately. Mr. Tan was out of the office until today.

7/9/07

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Mr. Tan returned my telephone call today and indicated there is a scheduled pre-motion conference for Monday, July 9, 2007. Consequently, I am getting confirmation of the conference three days before it.

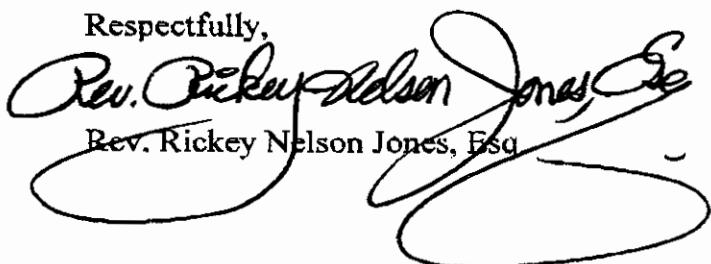
Since I did not see in the Individual Practices Of Judge Denny Chin that "Opposing counsel will notify each other of conferences.", I needed confirmation from the court for the conference. I am in the middle of extended Mediation in Federal Court in Washington, D.C. The attorneys for the Department of Justice and the Department of the Navy are at a standstill until Monday, July 9, 2007, which is when vacation ends for one of them and the Mediator's Proposal can be considered. The mediation has been occurring for several weeks and seems to finally be concluding. I need to be in town on Monday, July 9, 2007.

If it pleases the court, I respectfully request a postponement of the pre-motion conference. The week of July 23<sup>rd</sup> will work best for me (the week of July 16<sup>th</sup> includes an out-of-state obligation of mine regarding a matter before the Probate Court of Cuyahoga County, Ohio).

If it pleases the court, because of my need to [1] make travel arrangements, [2] travel to New York, and [3] adjust my schedule accordingly, I respectfully request direct notice from the court for all conferences, hearings, meetings, etc. This will eliminate my need to rely on opposing counsel for notice about court business, something I strongly prefer not to do.

Thank you for your kind consideration.

Respectfully,

  
Rev. Rickey Nelson Jones, Esq.

cc: Mr. Mark L. Weyman, Esq.

P.S. This letter was faxed (only) on today before 4:30 p.m., with verified transmission.